

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)
)
VS.) CASE NO. 2:06cr144-WKW-SRW
)
PAUL MEREZ GRAHAM)

UNOPPOSED MOTION TO CONTINUE

Comes now Defendant Paul Merez Graham and shows as follows:

1. Defendant Graham filed a motion to suppress on August 10, 2006. (Doc. 18). An addendum to the motion to suppress was filed on September 12, 2006. (Doc. 30).
2. A hearing on the motion to suppress was held on June 15, 2007.
3. On July 9, 2007, a recommendation was made that the motion to suppress be denied. (Doc. 61).
4. Defendant Graham's objections to the recommendation are due on this date.
5. This case is on this Court's August 6, 2007 trial docket.
6. Defendant Graham and the United States of America have started settlement negotiations in this matter which may involve a number of interviews before the parties are able to accurately assess the parameters of an appropriate settlement. Additional time is needed to do so.
7. The undersigned counsel has discussed this matter with Assistant United States Attorney Nathan Stump. Mr. Stump has no objection to continuing the trial of this case to the next term of court.

ACCORDINGLY, Defendant Paul Merez Graham moves this Court to continue the trial of this case to the next term of court.

s/ Thomas M. Goggans

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Paul Merez Graham

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CERTIFICATE OF SERVICE

I hereby certify that I have on this the 23d day of July, 2007, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such to the following: **Tommie Brown Hardwick, John T. Harmon, Nathan Stump.**

s/ Thomas M. Goggans
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